

**SAO**  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF, NEVADA**

HILLCREST INVESTMENTS, LTD., a  
Canadian Corporation; AMERGOSA  
ENTERPRISE, LLC.,  
Plaintiffs,

vs.

AMERICAN BORATE COMPANY a foreign  
corporation; AMERICAN BORATE COMPANY  
OF TEXAS a foreign corporation, STATE  
ENGINEER, STATE OF NEVADA,  
DEPARTMENT OF CONSERVATION AND  
NATURAL RESOURCES, DIVISION OF  
WATER RESOURCES, A Nevada Political  
Subdivision; RAMM Corporation, a Nevada  
Corporation; UNITED STATES FISH AND  
WILD SERVICE a division of the UNITED  
STATES; NATIONAL PARK SERVICE, a  
division of the UNITED STATES; and DOES I-  
V, ROES VI-X,

Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE  
TO FILE RESPONSE TO  
DEFENDANTS' AMERICAN BORATE  
COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS' RENEWED  
MOTION FOR SANCTIONS AND REPLY  
TO RESPONSE TO MOTION TO  
RECONSIDER**

**(THIRD REQUEST)**

**COMES NOW**, Plaintiffs **HILLCREST INVESTMENTS, LTD. and AMERGOSA  
ENTERPRISE, LLC** ("Plaintiffs") and Defendants, **AMERICAN BORATE COMPANY AND  
AMERICAN BORATE COMPANY OF TEXAS** (hereafter "American Borate") by and  
through their respective attorneys of record hereby stipulate and agree as follows:

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1 American Borate filed a Response to Plaintiffs' Motion to Reconsider. ( ECF No. 49). The  
2 Court granted a motion to extend the deadline for Plaintiffs to file a reply to July 21, 2022 (the  
3 "Reply"). (ECF No. 60). American Borate also filed a Renewed Motion for Sanctions  
4 ("Motion"). *See* ECF No. 64. The Court granted a stipulation to extend the deadline to file a  
5 response to the Renewed Motion to July 21, 2022 (the "Response"). (ECF No. 65).  
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Plaintiff timely filed a motion to extend the deadline to file the Response and the Reply from July 21, 2022 to July 27, 2022 ("Second Motion to Extend"). (ECF Nos. 67 and 68). The Court has not ruled on the Second Motion to Extend. However, the parties agree that this Stipulation renders the Second Motion to Extend moot, because the parties have agreed to extend the response deadline further due to counsel's workload and scheduling conflicts, caused in part by Plaintiffs' counsel's prior illness. The parties request the extension until August 4, 2022. This is the parties' third request.

**LEONARD LAW PC**

**LAW OFFICES OF BYRON  
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/s/ Debbie Leonard

/s/ Byron E. Thomas

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Attorney for American Borate  
Company and American Borate  
Company of Texas

Attorney for Plaintiffs

**IT IS SO ORDERED.**

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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 28th day of July, 2022.